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*Co-lead Class Counsel and Attorneys for Individual and
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Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, and Jon Fitch,
Brandon Vera, Luis Javier Vazquez, and Kyle
Kingsbury, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

No.: 2:15-cv-01045-RFB-(PAL)

PARTIES' JOINT STATUS REPORT

DATE: July 13, 2017

TIME: 1:45 PM

I. INTRODUCTION**II. Current Case Schedule.**

Pursuant to Orders of the Court, the operative case schedule is as follows:

Event	Date
Fact Discovery Cut Off	July 31, 2017
Hearing re Motion for Partial Summary Judgment re Nathan Quarry on Statute of Limitations Grounds (Dkts. 347, 348).	September 21, 2017 at 4:00 p.m.
Plaintiffs' Expert Reports, Class and Merits	August 31, 2017
Last Day to Depose Plaintiffs' Experts	September 29, 2017
Defendant's Expert Reports	October 27, 2017
Last Day to Depose Defendant's Experts	November 22, 2017
Reply Expert Reports	December 13, 2017
Class Certification/Daubert Motions to be filed	January 26, 2018

Certain depositions, as discussed below, are currently scheduled or anticipated to take place in August, after the discovery cutoff.

III. STATUS OF DISCOVERY**A. Document Production.****1. Zuffa**

On June 30, Zuffa produced 1,769 documents. On July 7, Zuffa produced an additional 6,946 documents. On July 10, Zuffa produced an additional 2,997 documents. Zuffa had previously withheld in full or produced in redacted format these documents under a claim of attorney-client privilege and/or work product protection.

2. WME

On June 30, WME produced an additional 8,979 documents.

3. Others

On May 2, third party AXS TV produced 991 documents. On May 4, AXS produced an additional 782 documents. On May 22, AXS produced an additional 6,968 documents. On June 5, AXS notified Plaintiffs that some privileged documents were inadvertently produced, causing the parties to cease review while AXS reviewed its productions to determine which documents to claw back. On June 15, AXS provided an overlay, allowing the parties to resume document review. Plaintiffs have challenged 3,334 of the 6,763 documents on AXS' first privilege log. Plaintiffs expect to receive a significant number of additional documents in response to this challenge.

B. Depositions

1. Zuffa.

The following 30(b)(1) depositions are currently scheduled on the dates and times indicated.

- Michael Mersch. July 14, 2017 (Las Vegas, Nevada)
- Kirk Hendrick. July 17-18, 2017 (Las Vegas, Nevada)
- Lawrence Epstein. July 21, 2017 (Las Vegas, Nevada)
- Dana White. August 9-10, 2017 (Las Vegas, Nevada)

Depositions pursuant to Rule 30(b)(6) of Zuffa's corporate designee are scheduled as follows:

- Sponsors. July 21, 2017 (Las Vegas, Nevada)
- Custodian of Records. July 27, 2017 (Las Vegas, Nevada)
- Fighter Compensation. July 31, 2017 (Las Vegas, Nevada)
- Valuations. The parties are discussing mutually-available dates.
- Financial data. The parties believe they can address these Topics through written responses in lieu of a deposition.

2. Third Parties

The following depositions are currently scheduled on the dates and times indicated.

- Leon Margules. July 11, 2017 (Ft. Lauderdale, Florida)
- The Raine Group. July 18, 2017 (New York, New York)
- AXS - Andrew Simon. July 19, 2017 (Dallas, Texas)

- WME - Brent Richard. July 20, 2017 (New York, New York)
- WME - Brad Slater. July 25, 2017 (Beverly Hills, California)
- Scott Coker. TBD
- Bob Arum. TBD

The following depositions have been timely noticed, but are subject to dispute and motion practice with the third parties.

- One Championship – Matt Hume.
- AXS - Mark Cuban.

3. Party Depositions Taken Since the Last Status Conference.

- Joe Silva. June 17.

IV. PENDING MOTIONS

A. Plaintiffs Emergency Motion To Compel Production Of Documents Withheld On Privilege Grounds And For Other Relief. (Dkt. 445)

On June 30, 2017, Plaintiffs filed an Emergency Motion to Compel Production of Documents Withheld on Privilege Grounds and for Other Relief (Dkt. 445).

As noted above, Zuffa has produced a substantial number of documents and believes that these productions moot the Plaintiffs' motion. In addition, Zuffa intends to oppose this motion by July 14, the time allowed by the Federal Rules.

Plaintiffs request that this Court address the motion at the hearing.

B. Custodian of Records Topics

On May 19, Plaintiffs served Zuffa with notice of a 30(b)(6) deposition regarding Zuffa's custodian of records. Plaintiffs seek information regarding information technology personnel; storage devices, email accounts and programs (including personal devices and programs used for business purposes); preservation policies; document retention efforts with regard to the instant litigation; and other topics. On May 22, Zuffa served its objections and responses on Plaintiffs. Multiple efforts to resolve the parties' differences were unsuccessful, and on June 7 the parties filed a joint letter with the Court, seeking resolution of certain outstanding issues.

The parties will be prepared to address the motion at the hearing.

1 **C. Motion For Partial Summary Judgment Re Nathan Quarry On Statute Of**
2 **Limitations Grounds (Dkts. 347, 348)**

3 On February 1, 2017, Zuffa filed a Motion for Partial Summary Judgment re Nathan Quarry on
4 Statute of Limitations Grounds (Dkts 347, 348). The matter is fully briefed. On July 11, 2017, Judge
5 Boulware set the motion for hearing on September 21, 2017 at 4:00 p.m.

6 **D. Motion To Quash Deposition Of Mark Cuban (AXS TV) (3:17-mc-00027-K, (N.D.**
7 **Tex.), Dkt. 1).**

8 On April 17, 2017, third party AXS TV filed a motion to quash Plaintiffs' deposition subpoena to
9 Mark Cuban in the Northern District of Texas. This motion has been fully briefed.

1 DATED: July 11, 2017

Respectfully Submitted,

2 JOSEPH SAVERI LAW FIRM, INC.

3 By: /s/Joseph R. Saveri
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By: /s/ Stacey K. Grigsby

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ATTESTATION OF FILER

The signatories to this document are Joseph R. Saveri and Stacey K. Grigsby, and I have obtained Stacey K. Grigsby's concurrence to file this document on her behalf.

Dated: July 11, 2017

By: /s/ Joseph R. Saveri
Joseph R. Saveri

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **PARTIES' JOINT STATUS REPORT** was served on July 11, 2017 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

Dated: July 11, 2017

By: /s/ Kevin E. Rayhill
Kevin E. Rayhill